

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTEGRATED HEALTH SERVICES OF
CLIFF MANOR, INC., INTEGRATED
HEALTH SERVICES AT RIVERBEND,
INTEGRATED HEALTH SERVICES AT
SOMERSET VALLEY, INC., ALPINE
MANOR, INC., BRIARCLIFF NURSING
HOME, INC., INTEGRATED HEALTH
GROUP, INC., SPRING CREEK OF IHS,
INC., FIRELANDS OF IHS, INC., ELM
CREEK OF IHS, INC. and IHS LONG
TERM CARE SERVICES, INC.

Plaintiffs,

v.

THCI COMPANY LLC,

Defendant,

and,

ABE BRIARWOOD CORPORATION and
JOHN DOES 1-10,

Additional Counterclaim
Defendant.

Civil Action No.: 04-910 (GMS)

**MOTION BY THCI COMPANY, LLC TO ENFORCE
THE STIPULATION AND ORDER OF SETTLEMENT AND DISMISSAL**

Defendant THCI Company, LLC, by and through its undersigned counsel, files a Motion to Enforce the Stipulation and Order of Settlement and Dismissal (hereinafter the "Motion"). In support of the Motion, THCI Company, LLC relies on its Brief filed simultaneously herewith.

PHILLIPS, GOLDMAN & SPENCE, P.A.

A handwritten signature in black ink, appearing to read 'Lisa C. McLaughlin', is written over a horizontal line.

LISA C. McLAUGHLIN, ESQUIRE (#3113)

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Attorneys Defendant THCI Company, LLC

Dated: